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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	Case No. 18-CR-00258 EJD
)	
Plaintiff,)	1/30/2023 DECLARATION OF AUSA ROBERT S.
)	LEACH IN SUPPORT OF UNITED STATES'
v.)	SUPPLEMENTAL BRIEF REGARDING
)	RESTITUTION
RAMESH "SUNNY" BALWANI,)	
)	Date: February 17, 2023
Defendant.)	Time: 10:00 a.m.
)	Court: Hon. Edward J. Davila

1 I, Robert S. Leach, declare:

2 1. I am an Assistant United States Attorney representing the United States of America, the
3 plaintiff in this case.

4 2. Attached as Exhibit A is a true and correct copy of SEC-USAO-EPROD-005034798
5 (THPFM0004651913), which was produced by Theranos to the SEC, and its attachment (SEC-USAO-
6 EPROD-005034799), filtered to include only one Excel tab and reflecting C-1 and C-2 investors.

7 3. Attached as Exhibit B is a victim impact statement from WVC Investments, LLC, a
8 Walgreen Co. subsidiary, received by Office and provided to the Probation Office in September 2022.

9 4. Attached as Exhibit C is a redacted victim impact statement from Eileen Lepera received
10 by Office and provided to the Probation Office in September 2022.

11 5. Attached as Exhibit D is a letter I received from counsel for PFM dated January 27, 2023.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14 Executed this 30th day of January 2023 in the Northern District of California.

15 /s/ Robert S. Leach

16 ROBERT S, LEACH

17 Assistant United States Attorney
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